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12 Attorneys for Defendant  
PHI McKEE, LP  
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14  
15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 NGOC LAM CHE, an individual,  
18

19 Plaintiff,

20 v.

21 PHI McKEE, LP, a limited partnership,  
22

23 Defendant.  
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CASE NO. 5:16-cv-2759-HRL

**THIRD STIPULATION AND  
[PROPOSED] ORDER TO EXTEND TIME  
FOR PHI McKEE, LP TO RESPOND TO  
PLAINTIFF'S COMPLAINT AND TO  
CONTINUE DATE FOR COMPLETION  
OF JOINT INSPECTION OF PREMISES**

1 IT IS HEREBY STIPULATED by and between Plaintiff NGOC LAM CHE  
2 ("Plaintiff") and Defendant PHI McKEE, LP ("Defendant"), through their counsel of record,  
3 as follows:

4 WHEREAS, Plaintiff filed a complaint in this matter ("Complaint") on May 21, 2016;

5 WHEREAS, on June 8, 2016, Defendant and Plaintiff filed a Stipulation to Extend  
6 Time for Defendant PHI McKee, LP to Respond to Plaintiff's Complaint to extend  
7 Defendant's time to respond to the Complaint to August 12, 2016;

8 WHEREAS, on August 10, 2016, Defendant and Plaintiff filed a Second Stipulation  
9 to Extend Time for Defendant PHI McKee, LP to Respond to Plaintiff's Complaint to  
10 extend Defendant's time to respond to the Complaint to September 6, 2016;

11 WHEREAS, Plaintiff and Defendant are engaged in continued discussions  
12 regarding potential early resolution and scheduling a joint inspection of the premises;

13 WHEREAS, in an effort to continue their early resolution discussions, Plaintiff and  
14 Defendant have agreed to extend Defendant's time to respond to the Complaint to  
15 October 6, 2016;

16 WHEREAS, Plaintiff and Defendant have also agreed to continue the date for  
17 completion of the joint site inspection until October 6, 2016.

18 THEREFORE, the parties do hereby stipulate as follows:

19 1 The parties stipulate to extend Defendant's time to respond to the  
20 Complaint to October 6, 2016; and

21 2. The parties stipulate to continue the date for completion of the joint site  
22 inspection to October 6, 2016.

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1 IT IS SO STIPULATED.  
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4 DATED: September 6, 2016

**ASCENSION LAW GROUP**

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6 By: /s/ Pamela Tsao

7 PAMELA TSAO  
8 Attorney for Plaintiff  
9 NGOC LAM CHE

10 DATED: September 6, 2016

**HANSON BRIDGETT LLP**

11  
12 By: /s/ Jennifer A. Foldvary

13 KURT A. FRANKLIN  
14 JENNIFER A. FOLDVARY  
15 Attorneys for Defendant  
16 PHI McKEE, LP  
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**ORDER**

PURSUANT TO THE STIPULATION OF THE PARTIES, and finding good cause therein,

IT IS HEREBY ORDERED that:

1. Defendant shall respond to the Complaint on or before October 6, 2016; and
2. The Parties shall complete a joint site inspection on or before October 6, 2016.

**IT IS SO ORDERED.**

DATE: \_\_\_\_\_

\_\_\_\_\_  
Hon. Howard R. Lloyd  
UNITED STATES MAGISTRATE JUDGE